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October 7, 2024

By ECF

Hon. Paul A. Engelmayer
United States District Court
Southern District of New York
40 Foley Square, Room 2201
New York, New York 10007

Re: *Frontier Airlines, Inc. v. AMCK Aviation Holdings Ireland Ltd.*, No. 22-cv-02943
Carlyle Aviation Management Ltd. v. Frontier Airlines, Inc., No. 23-cv-04774

Dear Judge Engelmayer:

We write respectfully on behalf of Frontier Airlines, Inc. ("Frontier"), plaintiff in Case No. 22-cv-02943 ("Case 2") and defendant in Case No. 23-cv-04774 ("Case 3" and, collectively, the "Related Actions"). We write with permission of all counsel in the Related Actions to notify the Court that a settlement has been reached concerning the Related Actions and the action captioned *Frontier Airlines, Inc. v. AMCK Aviation Holdings Ireland Ltd., et al.*, No. 20-cv-09713 (LLS), pending before the Honorable Louis L. Stanton ("Case 1"), and to request a stay of the deadlines in the Related Actions pending consummation of the settlement.

All parties have signed a final settlement agreement resolving the Related Actions before Your Honor and Case 1. Judge Stanton's Chambers has been advised of the settlement and the parties are waiting for funds to be paid out of the Court registry in satisfaction of the judgment rendered in Case 1. This is expected to happen in mid-October. Once this payment and another payment called for by the settlement agreement have been made, the parties will submit stipulations of dismissal with prejudice in the Related Actions.

In light of the settlement, the parties believe there is good cause to stay the Related Actions and adjourn all deadlines and conferences pending consummation of the settlement. The current Revised Civil Case Management Plan and Scheduling Order (the "Case Management Plan") was entered in Case 2 on July 24, 2024 (Case 2 ECF No. 157) and in Case 3 on July 18, 2024 (Case 3 ECF No. 86). The current deadline for fact discovery is October 14, 2024. The parties have previously requested four extensions of the deadlines in the Case Management Plan.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Eric B. Fisher
Eric B. Fisher

cc: All Counsel of Record (via ECF)

GRANTED. By separate order, the Court, per customary practice upon notice of a settlement in principle, will dismiss the case without prejudice to the right to reopen it within 30 days if the settlement has not been consummated.

SO ORDERED.

A handwritten signature in black ink, reading "Paul A. Engelmayer", is positioned above a horizontal line.

PAUL A. ENGELMAYER
United States District Judge

Dated: October 7, 2024
New York, New York